

Mullin, Michelle

From: Mullin, Michelle
Sent: Tuesday, November 12, 2019 3:57 PM
To: Castrilli, Laura
Cc: Bartus, Dave
Subject: RE: targeted peer review REVISED draft email to USEI FW: draft email to usei FW: PCB Process Building

FOIA Exempt- Internal Deliberative

Hi Laura- Please see my comments below.

Question: Did the closure plan require sampling of surrounding soils if the building is demolished or cleaned for a different use?

Thanks,

Michelle Mullin | PCB Coordinator and Team Leader | pronouns: she, her
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From: Castrilli, Laura <Castrilli.Laura@epa.gov>
Sent: Monday, November 4, 2019 3:04 PM
To: Mullin, Michelle <Mullin.Michelle@epa.gov>
Cc: Bartus, Dave <Bartus.Dave@epa.gov>
Subject: targeted peer review REVISED draft email to USEI FW: draft email to usei FW: PCB Process Building

Hopefully I captured our discussion at last week's PCB meeting sufficiently:

Rebecca, I understand from our subsequent conversations that the collapsed roof and walls have been disposed of in a PCB landfill unit, leaving just the riveted steel floor/foundation. I talked with our PCB coordinator regarding the PCB Process Building and also looked at the closure plan in Appendix 6 of the TSCA approval. The ~~original~~ closure plan requires the building be cleaned prior to re-use, or dismantled and disposed of ~~was to clean the building for future re-use or to dismantle the building and dispose of it in a PCB landfill cell~~. Since the **[Mullin, Michelle]** floor was not disposed of, and the building was not cleaned prior to collapse, EPA is concerned whether PCB contamination has affected the remaining floor/foundation and also the surrounding soils.

You indicated that past practice for the building when there were spills was immediate solvent cleanup of the spills. USEI did sample the little bit of water in the building sump and there were only minimal PCBs detected. **[Mullin, Michelle]** Based on these results you state that USEI is not concerned about rain contact. ~~based on sump results which should have been worse case scenario~~. Removal of the collapsed walls/roof of the building was handled by placing some materials into van trailers that were kept on a containment area **[Mullin, Michelle]** until transported ~~while USEI worked to remove the containers~~ to the USEI Beatty facility **[Mullin, Michelle]** for disposal (in a TSCA cell?). When the building debris was in the footprint of the riveted steel floor USEI covered them with tarps to prevent ~~further~~ infiltration by rain pending approval by IDEQ to resume landfill disposal. Materials were placed into haul trucks, taken to the landfill for disposal and coverage. **[Mullin, Michelle]** I'm not sure I understand how this last sentence is different from what you described two sentences earlier- were there different waste streams?

[Mullin, Michelle] EPA requires documentation of ~~Please provide a report documenting the partial closure activities, the justification for not sampling surrounding soils for contamination,~~ including the results for the sump water **[Mullin, Michelle]** and any information showing that the remaining steel floor is not a source of PCBs- this can include representative samples demonstrating that the decontamination standards of 40 CFR 761.79(b) have been met, or demonstration of compliance with the self-implementing decontamination procedures found in 40 CFR 761.79(c). **[Mullin, Michelle]** Please also provide PCB analysis results for any solid material accumulated in the building pump. EPA is also concerned that following the explosion the sump may not have been effective in directing the flow of water and any entrained contamination to the sump, rather than outside the footprint of the steel floor. Therefore, EPA requires USEI to conduct soil sampling around the perimeter of the building footprint. Please provide a soil sampling plan for my review. ~~In addition, in order to support a position that it is not necessary to representatively sample the surrounding building soils, provide PCB analysis results for any solid material accumulated in the building sump.~~ **[Mullin, Michelle]** *Laura- I would like to see soil samples, I think that is a necessary part of their compliance demonstration. I also added back in your language about sampling the steel floor, with the option for them to have simply decontaminated it in accordance with the self-implementing decontamination standards.*

Regarding retaining the ability to reconstruct the PCB Processing Building at a later date, the EPA would like to create a schedule for making this determination so that there is some expectation of eventually reconstructing the building or completing final closure steps for the remaining floor/foundation. Ideally, if the building will not be reconstructed, the EPA would like to see the safe recycling of the steel floor as opposed to disposal into a PCB landfill cell. However, we do understand that for business purposes, it may be preferable to simply dispose of the steel in the PCB landfill, in accordance with the current closure plan. Please let us know if USEI will be able to make a business decision on whether to rebuild or proceed with completing closure by January 31. This date is a proposed decision date, not a completion date for completing closure or rebuilding plans.

We understand USEI is working with IDEQ to rebuild the hazardous waste treatment building so it may be a few more months before USEI is ready to re-engage on finalizing the TSCA renewal application. Please let us know if USEI will be ready to re-start this effort by Spring of 2020, with a goal of having a TSCA renewal application submitted in early June of 2020.

Laura Castrilli
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From: Bartus, Dave <Bartus.Dave@epa.gov>
Sent: Friday, September 27, 2019 8:05 AM
To: Castrilli, Laura <Castrilli.Laura@epa.gov>; Mullin, Michelle <Mullin.Michelle@epa.gov>
Subject: RE: draft email to usei FW: PCB Process Building

Generally, looks good. Just a couple (OK, 4....) of suggestions to consider.

- 1) Rather than requiring an after-the-fact report, might you want to ask for a sampling and analysis plan and QAPP? That way, you'll have input on the sampling process to ensure when you do get a report, they won't have to re-do sampling that you don't like
- 2) While I don't disagree with sampling of the steel, I think an express decontamination requirement is in order. Of course, they could do a measurement-based decontamination.
- 3) I like your request for re-use. I'd replace "re-smelting" with "recycling" though. Smelting is processing of ore to produce a metallic product. If they re-use the floor plates, they'd just re-melt as scrap, not re-smelt. My nerdy comment of the day...
- 4) Given the change in circumstance, you may want to ask them to revise the closure plan for this unit in the approval.

Dave

From: Castrilli, Laura <Castrilli.Laura@epa.gov>
Sent: Thursday, September 26, 2019 2:18 PM
To: Mullin, Michelle <Mullin.Michelle@epa.gov>
Cc: Bartus, Dave <Bartus.Dave@epa.gov>
Subject: draft email to usei FW: PCB Process Building

So did some more research after lunch and drafted the following. Let me know if you think this is a good approach or if I should modify. I plan to be in the office Monday, Perhaps we can talk then if you have time.

Rebecca, I understand from our subsequent conversation that the collapsed roof and walls have been disposed of in a PCB landfill unit, leaving just the riveted steel floor/foundation. I talked with our PCB coordinator regarding the PCB Process Building and also looked at the closure plan in Appendix 6 of the TSCA approval. The original plan was to clean the building for future re-use or to dismantle the building and dispose of it in a PCB landfill cell. Since the building was not cleaned prior to collapse, there is concern whether PCB contamination has affected the remaining floor/foundation and also the surrounding soils.

Please provide a report showing that the surrounding soils have not been impacted by PCBs from the unanticipated collapse and removal of most of the building before it could be cleaned. The report must also include data showing that the remaining steel floor is not a source of potential further contamination or that the potential for further contamination has been mitigated. If mitigation steps were taken, please include details of the mitigation and associated periodic inspection steps that will be undertaken in order to ensure continued mitigation.

Regarding retaining the ability to reconstruct the PCB Processing Building at a later date, the EPA would like to create a schedule for making this determination so that there is some expectation of eventually reconstructing the building or determining final closure steps for the remaining floor/foundation. Ideally, if the building will not be reconstructed, the EPA would like to see the safe re-use or re-smelting of the steel floor as opposed to disposal into a PCB landfill cell. However, we do understand that for business purposes, it may be preferable to simply dispose of the steel in the PCB landfill, in accordance with the current closure plan. Please let us know if USEI will be able to make a business decision on whether to rebuild or proceed with completing closure by March 30. This date is a proposed decision date, not a completion date.

We understand USEI is working with IDEQ to rebuild the hazardous waste treatment building so it may be at least six months before USEI is ready to re-engage on finalizing the TSCA renewal application. Please let us know what a reasonable schedule for re-starting this effort would be.

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From: Rebecca Hogaboam <rebecca.hogaboam@usecology.com>
Sent: Monday, September 16, 2019 2:13 PM
To: Bartus, Dave <Bartus.Dave@epa.gov>; Castrilli, Laura <Castrilli.Laura@epa.gov>
Cc: Jason Evens <jason.evens@usecology.com>; Karlita Simper <karlita.simper@usecology.com>
Subject: PCB Process Building

Hello:

As you know, the PCB Process Building sustained significant structural damage and eventually collapsed due to this damage and sustained high winds at USEI during the month of January. USEI would like to continue to retain the ability

to reconstruct the PCB Process Building at a later date. The estimated date for rebuilding is still unknown at this time. For approval application purposes, would it be acceptable to say that the building is currently out of service? Is there some other language that we would need to use instead?

Thank you,

Rebecca Hogaboam

EH&S Compliance Manager

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